

REMARKS

Applicant has received and reviewed the Final Office Action mailed by the Office on July 12, 2007 (hereinafter, "Final Action"), and submits this response to the Final Action with a request for continued examination (RCE).

Claims 1-16, 18-34, 36-42, 44-52, 54, 73-76, and 78 remain pending in the present application. Applicant amends independent Claims 1, 19-34, 36, 37, 73-76, and 78 to clarify claimed subject matter. The original specification and drawings support these claim amendments at least at pages 16-19, 32-34, 39, and in Figure 8. Therefore, these revisions introduce no new matter.

Applicant respectfully requests reconsideration and allowance of the subject application in view of the foregoing amendments and the following remarks.

Statement of Substance of Interview

Applicant appreciates the Examiner's participation in a telephonic conference of October 26, 2007. Applicant wishes to thank the Examiner for his time and consideration.

During the interview, the claimed subject matter of the application and the Suarez and Berg references were discussed. In particular, Applicant presented arguments along the lines of those set forth below in the section entitled "Claim Rejections 35 U.S.C. §103". Specifically, Applicant presented arguments how the Suarez and Berg references do not teach or suggest features, such as XML.

Also discussed during the interview were proposed amendments to the claims. In the interest of expediting prosecution of the application, and without conceding the propriety of

the rejection, Applicant proposes to amend the independent claims to further clarify features of Applicant's claimed subject matter.

Applicant understands that the Examiner tentatively agrees that the proposed amendments overcome the outstanding rejections based on Suarez and Berg. The Examiner indicates that an updated search would be needed, and requests that the proposed amendments be presented in writing. Applicant understands the Examiner will contact Applicant for any unresolved issues in the amendments in writing in this Response.

Accordingly, Applicant amends the independent claims herein, as discussed during the interview. Applicant submits that all of the pending claims are in condition for allowance.

Claim Rejections under 35 U.S.C. §103

Claims 1-16, 18-34, 36-42, 44-52, 54, 73-76, and 78 stand rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent Number 5,790,789 to Suarez (hereinafter "Suarez"), further in view of U.S. Patent Number 5,999,911 to Berg et al. (hereinafter "Berg"). Applicant respectfully traverses the rejection.

Without conceding the propriety of the stated rejections, and in the interest of expediting allowance of the application, Applicant amends **independent Claim 1** as proposed during the interview and is believed to be allowable. Amended independent Claim 1 now recites:

In a distributed computing environment, a computer-implemented method for dynamically implementing a workflow responsive to state changes of objects in a directory, the directory comprising a network-based directory service providing storage and lookup of objects corresponding to

resources, the workflow comprising stored information defining a plurality of tasks and flow between the tasks, the method comprising:

automatically detecting a state change to an object in the directory,

and

responsive to detecting the state change, automatically:

mapping the state change to the object to the workflow; and

executing one of the tasks of the workflow;

wherein the workflow comprises an XML string having a plurality of defined workflows and a set of categorization rules that map a detected event to the defined workflows.

Applicant respectfully submits that no such method for implementing a workflow responsive to state changes of objects in a directory is taught or suggested by Suarez or Berg.

References Fail to Teach or Suggest XML String, Categorization Rules

First, Applicant asserts the Office has failed to establish a *prima facie* case of obviousness. Suarez is directed to a distributed computing system comprising a plurality of computer hosts for exchanging information and data between the computer hosts (Abstract). Suarez creates, modifies, and deletes domains to manage and to control domain to domain interactions (col. 13, lines 3-7). Applicant's Claim 1 recites "automatically detecting a state change to an object in the directory; and responsive to detecting the state change". There is no mention in Suarez of teaching or suggesting automatically detecting and responding to state changes. Rather, Suarez defines exchanging information and data, while Applicant's Claim 1 recites "automatically detecting a state change and responsive to detecting the state change, automatically mapping the state change to the object to the workflow".

Second, Berg fails to compensate for the deficiencies of Suarez. Berg is directed to a workflow, which includes a number of steps having encapsulations and dependency relationships (Abstract). Berg fails to teach or suggest “the workflow comprises an XML string having a plurality of defined workflows and a set of categorization rules that map a detected event to the defined workflows”, as recited in Applicant’s amended Claim 1. Thus, Berg does not provide what is missing from Suarez to support a §103 rejection.

Suarez and Berg, alone or in combination, do not teach or suggest “the workflow comprises an XML string based on a set of categorization rules”, as recited in Applicant’s Claim 1. Accordingly, Applicant submits that the evidence relied upon by the Office no longer supports the rejections made under §103(a).

The Cited Art Provides No Suggestion or Motivation to Modify or Combine the References

Next, to establish a *prima facie* case of obviousness, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings (MPEP §2142). The Office stated the motivation for combining the methods of Suarez and Berg is “by updating the state of the workflow instance in this manner all users working on the same instance of a workflow share the same view of the workflow as taught by Berg in Suarez to reduce the amount of deficiencies in terms of automating the processes ”. However, there is nothing in either of the references that would suggest this motivation. In addition, Suarez already creates, modifies, and deletes domains to manage and to control domain to domain interactions (col. 13, lines 3-7). Thus, there is no need to combine the

two references. The asserted motivation relies on hindsight without evidence of teaching or suggestion to propose the suggested combination. Thus, this rejection is improper for this additional reason.

Thus, even if, for the sake of argument, the teachings of Berg can be used to modify the system of Suarez, the combination would still lack at least the foregoing features of Applicant's amended Claim 1.

Applicant amends **Independent Claims 19, 37, and 73** to clarify claimed subject matter. Claims 19, 37, and 73 are directed to a computer-readable storage media, a computing device, and a computer-readable storage media, respectively, and each is allowable for reasons similar to those discussed above with respect to Claim 1.

Dependent Claims 2-16, 18, 20-34, 36, 38-42, 44-52, 74-76, and 78 depend directly or indirectly from one of independent Claims 1, 19, 37, and 73, respectively, and are allowable as depending from an allowable base claim. These claims are also allowable for their own recited features that, in combination with those recited in Claim 1, are not taught, or suggested by Suarez or Berg.

Applicant respectfully submits that the cited references do not render the claimed subject matter obvious and that the claimed subject matter, therefore, patentably distinguishes over the cited references. For all of these reasons, Applicant respectfully requests the §103(a) rejection of these claims should be withdrawn.

Conclusion

Claims 1-16, 18-34, 36-42, 44-52, 54, 73-76, and 78 are in condition for allowance. Applicant respectfully requests reconsideration and prompt allowance of the subject application. If any issue remains unresolved that would prevent allowance of this case, the Office is requested to contact the undersigned attorney to resolve the issue.

Respectfully Submitted,

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